

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY
15 Mountain View Road
Warren, NJ 07061-1615

Plaintiff,

v.

ALFRED KEMP, Individually and d/b/a
KEMP PLUMBING
P.O. Box 1322
Pembroke, MA 02359

and

MARTIN SANDBORG, Individually and d/b/a
SANDBORG PLUMBING AND HEATING
13 Liberty Street
Sandwich, MA 02563,

Defendants.

C.A. No.: 04-11975-RWZ

**AFFIDAVIT OF JOHN J. RYAN, JR. IN SUPPORT OF DEFENDANT'S,
ALFRED KEMP, INDIVIDUALLY AND D/B/A KEMP PLUMBING,
OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE
CERTAIN TESTIMONY FROM DEFENDANT KEMP'S EXPERTS QUINN
HORN AND TIMOTHY MYERS**

I, John J. Ryan, Jr., attorney for the defendant Alfred Kemp, Individually and d/b/a Kemp Plumbing in the above matter, do hereby state under oath:

1. A true and accurate copy of the Report of Thomas Klem dated July 29, 2005 is attached hereto as Exhibit A.
2. A true and accurate copy of the Report of Thomas Klem dated March 23, 2006 is attached hereto as Exhibit B.

3. A true and accurate copy of the Report of Timothy Myers dated March 7, 2006 is attached hereto as Exhibit C.
4. A true and accurate copy of the Report of Quinn Horn dated March 7, 2006 is attached hereto as Exhibit D.
5. A true and accurate copy of the Deposition of Alfred Kemp is attached hereto as Exhibit E.
6. A true and accurate copy of the Deposition of Kraig Magnussen is attached hereto as Exhibit F.
7. A true and accurate copy of the Deposition of Martin Sandborg is attached hereto as Exhibit G.
8. A true and accurate copy of the Deposition of Stephen Driscoll is attached hereto as Exhibit H.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 16th
DAY OF MAY, 2006.

/s/ John J. Ryan, Jr.
John J. Ryan, Jr.